

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

KARMELL L. SANDERS, an individual,

Plaintiff,

v.

TYSON PROCESSING SERVICES, INC., a  
corporation, and RAMON ARAMBULA, JR.,  
individually and in his capacity as Human  
Resources Manager for Tyson Processing  
Services, Inc.,

Defendants.

No. 8:19-cv-00255-JMG-SMB

**UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO FILE ANSWER OR  
OTHERWISE PLEAD IN RESPONSE TO  
PLAINTIFF'S COMPLAINT**

Defendants Tyson Processing Services, Inc. and Ramon Arambula, Jr., pursuant to Fed. R. Civ. P. 6(b)(1)(A), hereby move the Court for an order granting an extension of time, until August 14, 2019, to file an answer or otherwise plead in response to Plaintiff's Complaint in the above-captioned matter. In support of this Motion, Defendants state as follows:

1. On June 14, 2019, Plaintiff Karmell L. Sanders filed her Complaint for Damages and Jury Demand. (Doc. 1).

2. On June 24, 2019, Defendant Tyson Processing Services, Inc. was served with the Summons and a copy of the Complaint.

3. On June 29, 2019, Defendant Ramon Arambula, Jr. was served with the Summons and a copy of the Complaint.

4. In accordance with Fed. R. Civ. P. 12(a)(1)(A)(i), the deadline by which Defendant Tyson Processing Services, Inc. is required to file an answer or a motion under Rule 12(b) or 12(e) in response to Plaintiff's Complaint is July 15, 2019.

5. In accordance with Fed. R. Civ. P. 12(a)(1)(A)(i), the deadline by which Defendant Ramon Arambula, Jr. is required to file an answer or a motion under Rule 12(b) or 12(e) in response to Plaintiff's Complaint is July 22, 2019.

6. Defendants have recently retained counsel to defend it in this lawsuit. Due to the conflicting schedules and leaves of absence of those involved in this case, in addition to the Fourth of July holiday, counsel for Defendants requires additional time to gather facts and information necessary to file an answer or a motion under Rule 12(b) or 12(e).

7. In light of the foregoing, Defendants respectfully request an extension of time, until August 14, 2019, to file an answer or otherwise plead in response to Plaintiff's Complaint.

8. Counsel for Plaintiff does not object to the relief sought in this Motion.

WHEREFORE, Defendants Tyson Processing Services, Inc. and Ramon Arambula, Jr. respectfully request this Court grant an extension of time, until August 14, 2019, to file an answer or otherwise plead in response to Plaintiffs' Complaint.

Dated this 8<sup>th</sup> day of July, 2019.

TYSON PROCESSING SERVICES, INC. and  
RAMON ARAMBULA, JR., Defendants

By s/ Marcia A. Washkuhn

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